

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

Brittany M. Harless

Plaintiff

v.

Centra Health, Inc.; Virginia Baptist Hospital; &
Brenda Young

Defendant

Civil Action No. 6:11CV-00024

(If the action is pending in another district, state where:)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Mr. Victor Geovanetti, CEO, LewisGale Medical Center
1st Floor Administration, 1900 Electric Rd., Salem, VA 24513

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: A true copy or copies of any and all written policies or protocol adopted, observed or followed by LewisGale Medical Center and its staff and employees during the years 2005 to the present concerning or relating to the proper procedures and appropriate personnel to remove central venous catheter lines and/or central line catheters from patients having said lines removed in the Hospital.

Place: 819 Main Street
Lynchburg, VA 24504

Date and Time:

02/08/2012 9:00 am

☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: Jan. 18, 2012

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Sidney Kirstein
Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Brittany M. Harless

, who issues or requests this subpoena, are:

Sidney H. Kirstein, 819 Main St., Lynchburg, VA 24504; (434) 846-6868; email: skirsteinesq@aol.com

Civil Action No. 6:11CV-00024

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

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SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Mr. Scott Hill, CEO, LewisGale Hospital at Montgomery, Montgomery Regional Hospital
1st Floor, Administration, 3700 South Main St., Blacksburg, VA 24060

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: True copy(s) of any and all written policies or protocol adopted, observed or followed by LewisGale Hospital at Montgomery (a/k/a) Montgomery Regional Hospital and its staff and employees during the years 2005 to the present concerning or relating to the proper procedures and appropriate personnel to remove central venous catheter lines and/or central line catheters from patients having said lines removed in the Hospital.

Place: 819 Main Street
Lynchburg, VA 24504

Date and Time:

02/08/2012 9:00 am

☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

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Date: Jan. 18, 2012

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Sidney Kirstein
Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Brittany M. Harless

, who issues or requests this subpoena, are:

Sidney H. Kirstein, 819 Main St., Lynchburg, VA 24504; (434) 846-6868; email: skirsteinesq@aol.com

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My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: